

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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June 14, 2021

*By ECF*

Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Anthony Rose, 19 Cr. 789 (PGG)*

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

Paul G. Gardephe  
Paul G. Gardephe, U.S.D.J.

**Dated:** June 17, 2021

Dear Judge Gardephe:

I represent Anthony Rose, and write on consent (Assistant U.S. Attorney Louis Pellegrino and Pretrial Services Officer Courtney DeFeo) to respectfully request that the Court modify Mr. Rose's travel restrictions to allow him to travel on the dates specified below for business. Specifically, Mr. Rose has worked for several years in the business of selling natural hair for Ethnicity Hair Collections (EHC), and there is a tour during the second half of this year with trainings and conferences in the Southeastern United States and Puerto Rico. The Court has previously authorized Mr. Rose to travel on similar business trips. *See, e.g.*, Dkt. Nos. 200, 213, 249, 289, and 334.

Mr. Rose seeks permission to travel for the following events:

- July 3-5, 2021: Puerto Rico
- July 24-26, 2021: Columbia, SC
- August 14-16, 2021: Myrtle Beach, SC
- August 27-40, 2021: New Orleans, LA
- September 18-20, 2021: Savannah, GA
- October 23-25, 2021: Greenville, NC
- November 20-22, 2021: Raleigh, NC
- December 18-20, 2021: Charlotte, NC

Thank you for your consideration of this request.

Honorable Paul G. Gardephe  
June 14, 2021

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Re: *United States v. Anthony Rose*, 19 Cr. 789 (PGG)

Respectfully submitted,

/s/  
\_\_\_\_\_  
Martin S. Cohen  
Ass't Federal Defender  
(212) 417-8737

Cc: Louis Pellegrino, Esq., by ECF  
U.S. Pretrial Services Officer Courtney DeFeo